

BURNS BOWEN BAIR LLP
Timothy W. Burns, Esq. (admitted *pro hac vice*)
Jesse J. Bair, Esq. (admitted *pro hac vice*)
10 E. Doty St., Suite 600
Madison, WI 53703-3392
Telephone: (608) 286-2808
Email: tburns@bbblawllp.com
Email: jbair@bbblawllp.com

*Special Insurance Counsel to the Official Committee
of Unsecured Creditors of The Roman Catholic Diocese
of Rockville Centre, New York*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:
THE ROMAN CATHOLIC DIOCESE OF
ROCKVILLE CENTRE, NEW YORK,
Debtor.

Chapter 11
Case No. 20-12345 (MG)

**TWENTY-FIFTH MONTHLY FEE STATEMENT OF BURNS BOWEN BAIR LLP,
AS SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR PROFESSIONAL SERVICES RENDERED
AND DISBURSEMENTS INCURRED FOR THE PERIOD FROM
NOVEMBER 1, 2022 THROUGH NOVEMBER 30, 2022**

Name of Applicant:	Burns Bowen Bair LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors
Date of Retention:	Effective October 29, 2020 pursuant to Order dated December 9, 2020 [Docket No. 246]
Period for which compensation and reimbursement is sought:	November 1, 2022 – November 30, 2022
Amount of Compensation sought as actual, reasonable, and necessary:	\$71,218.00 80% of which is \$56,974.40
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	\$2,669.84
TOTAL (80% of fees and 100% of costs)	\$59,644.24

This is the Twenty-Fifth Monthly Fee Statement.

PRELIMINARY STATEMENT

Burns Bowen Bair LLP (“Burns Bowen Bair”), as Special Insurance Counsel to the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), hereby submits this twenty-fifth monthly statement (the “Monthly Statement”) for the period from November 1, 2022 through November 30, 2022 (the “Statement Period”) for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court’s *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”). Burns Bowen Bair requests: (a) interim allowance and payment of compensation in the amount of \$56,974.40 (80% of \$71,218.00) of fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bowen Bair and (b) reimbursement of actual and necessary costs and expenses in the amount of \$2,669.84.

FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD

1. Set forth below is a list of the positions of the Burns Bowen Bair professionals and paraprofessionals who provided services to the Committee during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Committee during the Statement Period.

Name	Title	Year of Partnership	Year of Admission	Hourly Rate	Total Hours Billed	Total Compensation
Timothy Burns	Partner	2008	1991	\$975	29.40	\$28,665.00
Timothy Burns Travel Rate				\$487.50	8.20	\$3,997.50
Jesse Bair	Partner	2020	2013	\$625	37.90	\$23,687.50
Jesse Bair Travel Rate				\$312.50	12.00	\$3,750.00
Brian Cawley	Associate	N/A	2020	\$420	.40	\$168.00
Nathan Kuenzi	Associate	N/A	2020	\$420	10.50	\$4,410.00
Leakhena Au	Associate	N/A	2020	\$420	6.20	\$2,604.00
Kacy Gurewitz	Associate	N/A	2021	\$420	7.30	\$3,066.00

Name	Title	Year of Partnership	Year of Admission	Hourly Rate	Total Hours Billed	Total Compensation
Kacy Gurewitz - No Charge-					1.30	\$0
Chalisa Sims	Associate	N/A	2021	\$420	.10	\$42.00
Brenda Horn-Edwards	Paralegal	N/A	N/A	\$360	2.30	\$828.00
TOTAL:					115.60	\$71,218.00

2. The rates charged by Burns Bowen Bair for services rendered to the Committee are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A**.

EXPENSES INCURRED DURING THE STATEMENT PERIOD

3. Set forth below is a categorical list of expenses incurred by Burns Bowen Bair during the Statement Period in the course of representing the Committee.

Date	Description	Amount
11/28/22	Delta Airline, T. Burns (MSN-LGA, Nov. 28-30)	\$925.20
11/28/22	Hotel, T. Burns (1 night)	\$570.37
11/28/22	Travel Meal, T. Burns	\$26.17
11/29/22	Travel Meal, J. Bair	\$25.27
11/29/22	Cab, J. Bair	\$49.12
11/29/22	MSN Airport Parking, J. Bair	\$10.00
11/29/22	Uber, J. Bair	\$99.03
11/29/22	Travel Meal, J. Bair	\$19.48
11/29/22	Delta Airlines, J. Bair (MSN-LGA, Nov. 29)	\$925.20
11/30/22	MSN Airport Parking, T. Burns	\$20.00
TOTAL:		\$2,669.84

NOTICE AND OBJECTION PROCEDURES

4. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Interim Compensation Order, Burns Bowen Bair has provided notice of this statement upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York,

NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). Burns Bowen Bair submits that no other or further notice need be provided.

5. Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the Application Recipients by **January 16, 2023** (the “Objection Deadline”) setting forth the nature of the objection and the amount of fees or expenses at issue.

6. If no objections to this Monthly Statement are made on or before the Objection Deadline, the Debtor shall pay Burns Bowen Bair 80% of the fees and 100% of the expenses set forth above. To the extent an objection to this Monthly Statement is timely made, the Debtor shall withhold payment of that portion of the Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such objection is not resolved; it shall be preserved and presented to the Court at the next interim or final fee application hearing.

Dated: December 21, 2022

BURNS BOWEN BAIR LLP

/s/ Timothy W. Burns

Timothy W. Burns, Esq. (admitted *pro hac vice*)

Jesse J. Bair, Esq. (admitted *pro hac vice*)

10 E. Doty St., Suite 600

Madison, WI 53703-3392

Telephone: (608) 286-2808

Email: tburns@bbblawllp.com

Email: jbair@bbblawllp.com

*Special Insurance Counsel to the Official
Committee of Unsecured Creditors of The Roman
Catholic Diocese of Rockville Centre, New York*

EXHIBIT A

Burns Bowen Bair LLP

10 E. Doty St., Suite 600
Madison, Wisconsin 53703-3392
608-286-2302
www.bbblawllp.com

**The Official Committee of Unsecured Creditors
of The Roman Catholic Diocese of Rockville
Centre**

Issue Date : 12/20/2022

Bill # : 01000

Matter: Insurance

Fees

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Billable Hours</u>	<u>Rate</u>	<u>Amount</u>
11/1/2022	Jesse Bair	Participate in conference with T. Burns and PSZJ team re case strategy in light of lack of progress in mediation (1.6);	1.60	\$625.00	\$1,000.00
11/1/2022	Jesse Bair	Participate in conference with I. Nasatir, B. Michael, and T. Burns re insurance case strategy (.6);	0.60	\$625.00	\$375.00
11/1/2022	Jesse Bair	Review draft litigation timeline circulated by B. Michael (.1);	0.10	\$625.00	\$62.50
11/1/2022	Jesse Bair	Review K. Dine correspondence to the Committee re case update (.1);	0.10	\$625.00	\$62.50
11/1/2022	Jesse Bair	Correspondence with B. Michael and J. Stang re recent Diocesan document production (.1);	0.10	\$625.00	\$62.50
11/1/2022	Jesse Bair	Correspondence with B. Michael re next round of interim fee applications (.1);	0.10	\$625.00	\$62.50
11/1/2022	Jesse Bair	Provide supplemental instructions to L. Au re research on potential insurance Plan options (.1);	0.10	\$625.00	\$62.50
11/1/2022	Kacy Gurewitz	Supplemental research re bankruptcy law in connection with post-confirmation insurance litigation issues (2.5);	2.50	\$420.00	\$1,050.00
11/1/2022	Leakhena Au	Continue supplemental research re insurance treatment under potential Plan options (3.2);	3.20	\$420.00	\$1,344.00
11/1/2022	Timothy Burns	Participate in conference with PSZJ team and J. Bair re case strategy in light of lack of progress in mediation (1.6); met with I. Nasatir, B. Michael, and J. Bair re insurance case strategy (.6); reviewed email exchange between PZSJ and Claro re adult claims (.1);	2.30	\$975.00	\$2,242.50
11/1/2022	Brenda Horn	Draft sixth interim fee application (1.2), draft declaration of T. Burns (.3); draft related exhibits (.7); correspond with J. Bair re same (.1);	2.30	\$360.00	\$828.00

11/2/2022	Nathan Kuenzi	Examine current draft of the Committee's opposition to the Debtor's preliminary junction motion (.5);	0.50	\$420.00	\$210.00
11/2/2022	Jesse Bair	Review recent Orders re FCC license sale (.1);	0.10	\$625.00	\$62.50
11/2/2022	Jesse Bair	Review and edit current draft of the insurance section of the Committee's preliminary injunction opposition brief (.3);	0.30	\$625.00	\$187.50
11/2/2022	Jesse Bair	Attend Court status conference (.3); participate in post-hearing conference with T. Burns re outcome of same and mediation next-steps (.2);	0.50	\$625.00	\$312.50
11/2/2022	Timothy Burns	Attend status hearing (.3); participate in post-call with J. Bair re outcome of same (.2);	0.50	\$975.00	\$487.50
11/3/2022	Timothy Burns	Reviewed the Diocese's counter (.2); conference with J. Bair re same (.2); correspondence with PSZJ team re same (.2);	0.60	\$975.00	\$585.00
11/3/2022	Jesse Bair	Analysis regarding the Diocese's counter-offer (.2); correspondence with PSZJ team re same (.1);	0.30	\$625.00	\$187.50
11/3/2022	Jesse Bair	Correspondence with N. Kuenzi re the Committee's preliminary injunction opposition brief (.1);	0.10	\$625.00	\$62.50
11/3/2022	Leakhena Au	Continue supplemental research re insurance treatment under potential Plan options (2.9);	2.90	\$420.00	\$1,218.00
11/3/2022	Kacy Gurewitz	Review L. Au memo re bankruptcy insurance assignment issues (.3);	0.30	\$420.00	\$126.00
11/3/2022	Nathan Kuenzi	Continue examining current draft of the Committee's opposition to the Debtor's preliminary junction motion (.8);	0.80	\$420.00	\$336.00
11/4/2022	Jesse Bair	Participate in state court counsel meeting re the Diocese's counter and potential response to same (.8); participate in post-meeting conference with T. Burns re same (.1);	0.90	\$625.00	\$562.50
11/4/2022	Jesse Bair	Review K. Gurewitz summary re Ecclesia coverage for non-abuse claims (.2); additional analysis of Ecclesia policy re same (.1);	0.30	\$625.00	\$187.50
11/4/2022	Jesse Bair	Review L. Au summary re additional insured issues (.2);	0.20	\$625.00	\$125.00
11/4/2022	Timothy Burns	Participate in state court counsel meeting re the Diocese's counter and potential response to same (.8); participate in post-meeting conference with J. Bair re same (.1); review L. Au's memo regarding bankruptcy insurance assignment issues (1.6); review correspondence between PSZJ and Committee members re recent settlement of other Diocesan bankruptcy case (.2);	2.70	\$975.00	\$2,632.50
11/5/2022	Timothy Burns	Analysis re case assignments (.2); reviewed memo regarding counter from PSZJ (.2);	0.40	\$975.00	\$390.00

11/5/2022	Jesse Bair	Review correspondence from B. Michael and Committee member re recent settlement in another Diocesan bankruptcy case (.1);	0.10	\$625.00	\$62.50
11/6/2022	Jesse Bair	Review and edit BBB's sixth interim fee application and related exhibits (1.0);	1.00	\$625.00	\$625.00
11/7/2022	Nathan Kuenzi	Participate in conference with BBB team re case status and assignments (.1);	0.10	\$420.00	\$42.00
11/7/2022	Kacy Gurewitz	Participate in conference with BBB team re case status and assignments (.1);	0.10	\$420.00	\$42.00
11/7/2022	Leakhena Au	Participate in conference with BBB team re case status and assignments (.1);	0.10	\$420.00	\$42.00
11/7/2022	Brian Cawley	Participate in conference with BBB team re case status and assignments (.1);	0.10	\$420.00	\$42.00
11/7/2022	Chalisa Sims	Participate in conference with BBB team re case status and assignments (.1);	0.10	\$420.00	\$42.00
11/7/2022	Timothy Burns	Participate in call with the mediator (.2); conference with J. Bair re associate assignments (.2); conference with J. Bair re recent call with the mediator (.2);	0.60	\$975.00	\$585.00
11/7/2022	Jesse Bair	Participate in conference with T. Burns re associate assignments (.2); participate in conference with associate team re case status and assignments (.1);	0.30	\$625.00	\$187.50
11/7/2022	Jesse Bair	Review B. Michael memorandum to the Committee re the Diocese's counter and potential response to same (.1);	0.10	\$625.00	\$62.50
11/7/2022	Jesse Bair	Review agenda for upcoming Committee meeting (.1);	0.10	\$625.00	\$62.50
11/7/2022	Jesse Bair	Participate in conference with T. Burns re recent call with the mediator (.2);	0.20	\$625.00	\$125.00
11/8/2022	Jesse Bair	Participate in Committee meeting re mediation strategy and response to the Diocese's counter (1.4);	1.40	\$625.00	\$875.00
11/8/2022	Timothy Burns	Participate in portion of Committee meeting re mediation strategy and response to the Diocese's counter (1.0);	1.00	\$975.00	\$975.00
11/8/2022	Timothy Burns	Review correspondence from B. Michael re November 2 hearing (.1);	0.10	\$975.00	\$97.50
11/8/2022	Timothy Burns	Reviewed meeting materials for November 8 Committee meeting (.2);	0.20	\$975.00	\$195.00
11/8/2022	Timothy Burns	Review and respond to email from the mediator re upcoming mediation sessions (.1);	0.10	\$975.00	\$97.50
11/8/2022	Jesse Bair	Review and respond to correspondence with the mediator re upcoming mediation sessions (.2); correspondence with K. Dempski re same (.1);	0.30	\$625.00	\$187.50

11/9/2022	Jesse Bair	Review and edit draft Committee response to the Diocese's counter-offer (.1); review correspondence with PSZJ team re same (.1); review final version of the Committee response letter (.1);	0.30	\$625.00	\$187.50
11/9/2022	Jesse Bair	Review correspondence with PSZJ re edits to the revised draft of the Committee's preliminary injunction opposition brief (.1);	0.10	\$625.00	\$62.50
11/9/2022	Jesse Bair	Review objection to the Diocese's FCC motion (.1);	0.10	\$625.00	\$62.50
11/9/2022	Kacy Gurewitz	Brief analysis re an insurer's notice obligation, if any, after coverage denial (.2);	0.20	\$420.00	\$84.00
11/9/2022	Timothy Burns	Reviewed correspondence from PZSJ re the Diocese's FCC motion (.1);	0.10	\$975.00	\$97.50
11/9/2022	Timothy Burns	Review correspondence from J. Stang to the mediator communicating the Committee's counter (.1);	0.10	\$975.00	\$97.50
11/9/2022	Timothy Burns	Review correspondence from PSZJ re negotiation strategy with diocese (.1);	0.10	\$975.00	\$97.50
11/9/2022	Timothy Burns	Review correspondence with the mediator and PSZJ team re upcoming mediation sessions (.2);	0.20	\$975.00	\$195.00
11/10/2022	Timothy Burns	Conference with J. Bair re litigation strategy (.1);	0.10	\$975.00	\$97.50
11/10/2022	Timothy Burns	Brief review of limited objection to the Diocese's bidding procedures motion (.1);	0.10	\$975.00	\$97.50
11/10/2022	Jesse Bair	Participate in conference with PSZJ team re mediation strategy and potential next-steps (1.3);	1.30	\$625.00	\$812.50
11/10/2022	Jesse Bair	Supplemental analysis re Arrowood additional insured issues (.3); draft correspondence to B. Michael and I. Nasatir re same (.2);	0.50	\$625.00	\$312.50
11/10/2022	Jesse Bair	Participate in conference with T. Burns re litigation strategy (.1);	0.10	\$625.00	\$62.50
11/10/2022	Jesse Bair	Review revised draft of proposed preliminary injunction briefing schedule (.1);	0.10	\$625.00	\$62.50
11/10/2022	Jesse Bair	Review correspondence with K. Brown and J. Elkin re revised draft of the preliminary injunction opposition brief (.1);	0.10	\$625.00	\$62.50
11/11/2022	Kacy Gurewitz	Review filings re case background to inform ongoing insurance research projects (.5);	0.50	\$420.00	No Charge
11/11/2022	Jesse Bair	Participate in call with T. Burns re case insurance strategy (.1);	0.10	\$625.00	\$62.50
11/11/2022	Jesse Bair	Prepare for state court counsel meeting (.1); participate in state court counsel meeting re mediation and insurance strategy (.6);	0.70	\$625.00	\$437.50
11/11/2022	Jesse Bair	Review correspondence with PSZJ re potential motion for excess pages re draft preliminary objection opposition (.1);	0.10	\$625.00	\$62.50

11/11/2022	Jesse Bair	Review monthly PSIP information received from the Diocese (.1);	0.10	\$625.00	\$62.50
11/11/2022	Jesse Bair	Review B. Michael correspondence re potential Diocesan control of particular Catholic entities on Long Island (.1);	0.10	\$625.00	\$62.50
11/11/2022	Timothy Burns	Prepare for state court counsel meeting (.1); participate in state court counsel meeting re mediation and insurance strategy (.6); participate in call with J. Bair re case insurance strategy (.1);	0.80	\$975.00	\$780.00
11/11/2022	Jesse Bair	Review the debtor's reply brief in support of its FCC motion (.2);	0.20	\$625.00	\$125.00
11/13/2022	Timothy Burns	Analysis re insurance strategy in connection with upcoming January mediation sessions (.6);	0.60	\$975.00	\$585.00
11/13/2022	Timothy Burns	Reviewed Debtor monthly PSIP information (.1);	0.10	\$975.00	\$97.50
11/13/2022	Timothy Burns	Reviewed correspondence from J. Bair to PSZJ re Arrowood additional insured issues (.1); review accompanying chart (.1);	0.20	\$975.00	\$195.00
11/14/2022	Kacy Gurewitz	Review filings re case background to inform ongoing insurance research projects (.8);	0.80	\$420.00	No Charge
11/14/2022	Timothy Burns	Participate in conference with J. Bair re draft Committee plan (.1); review and respond to correspondence from J. Bair re same (.1); review draft email to debtor's counsel from Committee re non-abuse claims (.1);	0.30	\$975.00	\$292.50
11/14/2022	Jesse Bair	Begin reviewing revised draft of the Committee's preliminary injunction opposition brief (.3);	0.30	\$625.00	\$187.50
11/14/2022	Jesse Bair	Review final version of BBB's sixth interim fee application (.1);	0.10	\$625.00	\$62.50
11/14/2022	Jesse Bair	Participate in conference with T. Burns re draft Committee plan (.1); correspondence with B. Michael re same (.1);	0.20	\$625.00	\$125.00
11/15/2022	Jesse Bair	Review B. Michael correspondence re mediation update and upcoming hearing (.1);	0.10	\$625.00	\$62.50
11/15/2022	Jesse Bair	Review notice of agenda for November 16 hearing (.1);	0.10	\$625.00	\$62.50
11/15/2022	Jesse Bair	Review B. Michael correspondence to the Debtor re non-abuse claims information (.1);	0.10	\$625.00	\$62.50
11/15/2022	Jesse Bair	Correspondence with K. Brown re revised draft of the Committee's preliminary injunction opposition brief (.1);	0.10	\$625.00	\$62.50
11/16/2022	Brian Cawley	Conference with K. Gurewitz re New York bad faith research project (.3);	0.30	\$420.00	\$126.00
11/16/2022	Kacy Gurewitz	Conference with B. Cawley re New York bad faith research project (.3); begin case law research re New York bad faith law (3.7);	4.00	\$420.00	\$1,680.00

11/16/2022	Timothy Burns	Participate in conference with J. Bair re New York bad faith law (.2); conference with K. Gurewitz re bad faith research assignment (.1); analyze prior research re New York bad faith standards (.2); review B. Michael correspondence re claims objections and judicial mediator potential motion (.1); reviewed correspondence between BBB and PSZJ re preliminary injunction opposition motion (.1); reviewed claims objection and judicial mediator motion (.9); participate in call with state court counsel re same (.2); attended hearing re mediation issues and FCC license sale (1.5);	3.30	\$975.00	\$3,217.50
11/16/2022	Jesse Bair	Review the Diocese's draft claim objection and settlement motion (.4); review correspondence from PSZJ re same (.1); conference with T. Burns re same (.1);	0.60	\$625.00	\$375.00
11/16/2022	Jesse Bair	Review correspondence from B. Michael re mediation update (.1);	0.10	\$625.00	\$62.50
11/16/2022	Jesse Bair	Attend Court hearing re mediation issues and FCC license sales (1.5);	1.50	\$625.00	\$937.50
11/16/2022	Jesse Bair	Participate in conference with T. Burns re New York bad faith law (.2);	0.20	\$625.00	\$125.00
11/17/2022	Jesse Bair	Participate in conference with T. Burns re mediation strategy (.1);	0.10	\$625.00	\$62.50
11/17/2022	Jesse Bair	Prepare for team strategy meeting with PSZJ (.1); participate in team conference with PSZJ and T. Burns re mediation and litigation strategy (1.4); participate in post-call with T. Burns re follow-up needed in connection with same (.2);	1.70	\$625.00	\$1,062.50
11/17/2022	Jesse Bair	Participate in Committee meeting re mediation and litigation strategy (1.2);	1.20	\$625.00	\$750.00
11/17/2022	Jesse Bair	Review Order re oral argument in the Arrowood district court action on Arrowood's motion to compel (.1);	0.10	\$625.00	\$62.50
11/17/2022	Jesse Bair	Conference with T. Burns re outcome of call with state court counsel re mediation strategy issues (.1);	0.10	\$625.00	\$62.50

11/17/2022	Timothy Burns	Conference with J. Bair re mediation strategy (.1); review agenda for Committee meeting (.1); reviewed B. Michael correspondence re upcoming team meeting between PSZJ and BBB (.1); participate in conference with PSZJ team and J. Bair re mediation and insurance strategy (1.4); post-call with J. Bair re follow-up needed in connection with same (.2); participate in call with state court counsel re mediation strategy issues (.2); conference with J. Bair re outcome of same (.1); review revised PSZJ litigation timeline (.2); participate in Committee meeting re mediation and litigation strategy (1.2);	3.60	\$975.00	\$3,510.00
11/18/2022	Timothy Burns	Prepare for mediation strategy meeting with state court counsel, including review of Claro valuations (.9); conference with J. Bair re same (.2); participate in state court counsel meeting re mediation strategy (1.1); participate in follow-up call with particular state court counsel re same (.1); analysis re motion to compel issues in Arrowood district court action (.1);	2.40	\$975.00	\$2,340.00
11/18/2022	Jesse Bair	Participate in conference with T. Burns re insurance strategy in advance of state court counsel meeting (.2); participate in state court counsel meeting re mediation and litigation strategy (1.1);	1.30	\$625.00	\$812.50
11/18/2022	Jesse Bair	Review revised litigation timeline circulated by B. Michael (.2); review correspondence with PSZJ team re same (.1);	0.30	\$625.00	\$187.50
11/18/2022	Jesse Bair	Review correspondence from K. Dine to the Committee re recommendation re mediation counter (.1);	0.10	\$625.00	\$62.50
11/18/2022	Jesse Bair	Review correspondence with state court counsel re potential mediation counter (.1);	0.10	\$625.00	\$62.50
11/18/2022	Jesse Bair	Participate in call with Chambers re the upcoming motion to compel hearing in the Arrowood district court action (.1);	0.10	\$625.00	\$62.50
11/20/2022	Timothy Burns	Review correspondence between PSZJ, state court counsel, and the Committee re potential counter offer (.2);	0.20	\$975.00	\$195.00
11/20/2022	Jesse Bair	Review correspondence with B. Michael and state court counsel re potential counter offer (.1);	0.10	\$625.00	\$62.50
11/21/2022	Timothy Burns	Review notice re January 4 omnibus hearing (.1); reviewed potential mediation response (.2);	0.30	\$975.00	\$292.50

11/21/2022	Nathan Kuenzi	Review correspondence from J. Bair re supplemental analysis needed in connection with insurance programs potentially triggered by each of the individual CVA actions (.2); begin analyzing case materials to draft chart summarizing same (1.8);	2.00	\$420.00	\$840.00
11/21/2022	Jesse Bair	Continue reviewing and editing the Committee's revised objection brief to the Diocese's preliminary injunction motion (1.6);	1.60	\$625.00	\$1,000.00
11/21/2022	Jesse Bair	Review prior analysis re insurance programs potentially triggered by each of the CVA actions (.2); correspond with N. Kuenzi re supplemental analysis needed in connection with same (.2);	0.40	\$625.00	\$250.00
11/22/2022	Nathan Kuenzi	Continue analyzing case materials to draft summary reflecting insurance program(s) potentially triggered, if any, by each of the individual CVA actions (6.9);	6.90	\$420.00	\$2,898.00
11/22/2022	Nathan Kuenzi	Participate in conferences with J. Bair re supplemental analysis of potential insurance impacts of each CVA action (.2);	0.20	\$420.00	\$84.00
11/22/2022	Timothy Burns	Participate in conference with PSZJ and J. Bair re Committee issues (.1);	0.10	\$975.00	\$97.50
11/22/2022	Jesse Bair	Participate in conference with PSZJ and T. Burns re Committee issues (.1);	0.10	\$625.00	\$62.50
11/22/2022	Jesse Bair	Begin drafting insurance sections of revised draft of the Committee's preliminary injunction opposition brief (2.5);	2.50	\$625.00	\$1,562.50
11/22/2022	Jesse Bair	Review N. Kuenzi supplemental analysis re potential insurance impacts of each CVA action (.2); participate in conferences with N. Kuenzi re same (.2);	0.40	\$625.00	\$250.00
11/22/2022	Jesse Bair	Review the Diocese's response to the Committee's counter (.1);	0.10	\$625.00	\$62.50
11/23/2022	Jesse Bair	Additional review of N. Kuenzi supplemental analysis re insurance impact of each CVA action (.4);	0.40	\$625.00	\$250.00
11/23/2022	Jesse Bair	Finish drafting insurance sections of revised preliminary injunction opposition brief (4.0);	4.00	\$625.00	\$2,500.00
11/23/2022	Jesse Bair	Review K. Dine correspondence to state court counsel re the Diocese's response to the Committee's counter (.1); review correspondence from state court counsel re potential response to same (.1);	0.20	\$625.00	\$125.00
11/25/2022	Timothy Burns	Review correspondence with PSZJ and state court counsel re judicial mediator proposal (.2);	0.20	\$975.00	\$195.00
11/28/2022	Timothy Burns	Review briefing in preparation for Arrowood motion to compel hearing (2.2);	2.20	\$975.00	\$2,145.00
11/28/2022	Timothy Burns	Travel from Madison to New York for motion to compel hearing [billed at 1/2 travel rate] (3.9);	3.90	\$487.50	\$1,901.25

11/28/2022	Jesse Bair	Provide instructions to K. Gurewitz re supplemental research needed on insurer bad faith (.2);	0.20	\$625.00	\$125.00
11/28/2022	Jesse Bair	Review correspondence with K. Dine and the Committee re the Diocese's response to the Committee's counter (.1);	0.10	\$625.00	\$62.50
11/28/2022	Jesse Bair	Prepare for state court counsel meeting (.1); participate in state court counsel meeting re mediation and litigation strategy (1.4); draft email memo to T. Burns summarizing outcome of same (.2);	1.70	\$625.00	\$1,062.50
11/28/2022	Jesse Bair	Review correspondence with PSZJ team re additional preliminary injunction opposition brief edits (.1);	0.10	\$625.00	\$62.50
11/29/2022	Jesse Bair	Travel from Madison to New York for motion to compel hearing [billed at 1/2 travel rate] (5.1);	5.10	\$312.50	\$1,593.75
11/29/2022	Jesse Bair	Review motion to compel briefing in preparation for hearing (1.8);	1.80	\$625.00	\$1,125.00
11/29/2022	Jesse Bair	Review correspondence from the mediator re upcoming mediation sessions (.1);	0.10	\$625.00	\$62.50
11/29/2022	Jesse Bair	Attend motion to compel hearing (2.3);	2.30	\$625.00	\$1,437.50
11/29/2022	Jesse Bair	Return travel from New York to Madison from motion to compel hearing [billed at 1/2 travel rate] (6.9);	6.90	\$312.50	\$2,156.25
11/29/2022	Timothy Burns	Prepare for motion to compel hearing (.5); participate in motion to compel hearing (2.3); post-hearing discussion with diocese's insurance counsel re outcome of same (.4);	3.20	\$975.00	\$3,120.00
11/30/2022	Timothy Burns	Return travel from motion to compel hearing to Madison [billed at 1/2 travel rate] (4.3);	4.30	\$487.50	\$2,096.25
11/30/2022	Timothy Burns	Review revised litigation timeline (.1); review B. Michael correspondence re same (.1); review minutes from recent Committee meeting (.1); reviewed correspondence from the mediator re upcoming mediation sessions (.1); reviewed emails from PSZJ re the draft preliminary injunction opposition brief (.1); reviewed emails between PSZJ and the Committee re diocese's position re mediation (.1); review email memo from J. Bair re outcome of recent state court counsel meeting (.1); review current draft of the Committee's preliminary injunction opposition brief (1.4) correspondence with J. Bair re potential edits to same (.1); review joint letter of diocese and LMI re ongoing discovery dispute (.1); conference with J. Bair re potential Arrowood strategy (.2); conference with K. Gurewitz re research needed in connection with same (.2);	2.70	\$975.00	\$2,632.50
11/30/2022	Jesse Bair	Conference with T. Burns re Arrowood strategy (.2);	0.20	\$625.00	\$125.00

11/30/2022	Jesse Bair	Review B. Michael correspondence re Plan issues (.1);	0.10	\$625.00	\$62.50
11/30/2022	Jesse Bair	Review the Committee's notice of termination of standstill period (.1);	0.10	\$625.00	\$62.50
11/30/2022	Jesse Bair	Review agenda for December 2 hearing (.1);	0.10	\$625.00	\$62.50
11/30/2022	Kacy Gurewitz	Meet with T. Burns regarding Arrowood Arrowood project (.2);	0.20	\$420.00	\$84.00
Fees Subtotal			115.60		\$71,218.00

Expenses

<u>Date</u>	<u>Description</u>	<u>Amount</u>
11/28/2022	Delta Airlines, T. Burns (MSN-LGA, Nov. 28-30)	\$925.20
11/28/2022	Hotel, T. Burns (1 night)	\$570.37
11/28/2022	Travel Meal, T. Burns	\$26.17
11/29/2022	Travel Meal, J. Bair	\$25.27
11/29/2022	Cab, J. Bair	\$49.12
11/29/2022	Airport parking, J. Bair	\$10.00
11/29/2022	Uber, J. Bair (Courthouse to Airport)	\$99.03
11/29/2022	Travel Meal, J. Bair	\$19.48
11/29/2022	Delta Airlines, J. Bair (MSN-LGA Nov. 29)	\$925.20
11/30/2022	Airport parking, T. Burns	\$20.00
Expenses Subtotal		\$2,669.84

Staff Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn	2.30	\$360.00	\$828.00
Brian Cawley	0.40	\$420.00	\$168.00
Chalisa Sims	0.10	\$420.00	\$42.00
Jesse Bair	12.00	\$312.50	\$3,750.00
Jesse Bair	37.90	\$625.00	\$23,687.50
Kacy Gurewitz	7.30	\$420.00	\$3,066.00
Kacy Gurewitz	1.30	No Charge	No Charge
Leakhena Au	6.20	\$420.00	\$2,604.00
Nathan Kuenzi	10.50	\$420.00	\$4,410.00
Timothy Burns	8.20	\$487.50	\$3,997.50
Timothy Burns	29.40	\$975.00	\$28,665.00

Total Due This Invoice: \$73,887.84